ORIGINAL
FILE

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

In the Matter of	)	
	)	
Local Exchange Carrier Line Information Database	)	CC Docket 92-24
	)	

TO THE COMMISSION

REPLY OF SOUTHWESTERN BELL TELEPHONE COMPANY

SOUTHWESTERN BELL TELEPHONE COMPANY

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CC Docket No. 92-24

REPLY OF SOUTHWESTERN BELL TELEPHONE COMPANY

Table of Contents

	Subject	Page
	SUMMARY	i
I.	INTRODUCTION	1
II.	SWBT'S TARIFFS CONTAIN THE INFORMATION REQUIRED	1
III.	SWBT'S LIDB PRICES COMPLY WITH THE RULES ESTABLISHED BY THE COMMISSION	9
	A. MCI	10
	B. Sprint	13
	C. Allnet	14
IV.	SWBT'S LIDB AND MUTUAL CARD HONORING AGREEMENTS WITH AT&T ARE NEITHER ILLEGAL NOR DISCRIMINATORY	17
V.	CONCLUSION	19

SUMMARY*

The five Oppositions filed against SWBT's Direct Case do not raise any meritorious issues and therefore should be rejected.

MCI contends that LIDB tariffs should contain ten specific items. SWBT's tariffs already comply with six of the ten MCI requests. Generally available sources exist for two others, and SWBT intends to provide MCI with sufficient notice for the coordination identified in another request. The single remaining request is unreasonable, burdensome and potentially damaging to SWBT.

Several parties complain about SWBT's LIDB prices. MCI complains that LIDB is a monopoly service and should not be priced at a market basis. But SWBT's calling card and validation services are no monopoly. MCI, other major interexchange carriers and the other regional Bell operating companies all have their own cards and validation services.

In accordance with Commission rules for new service filings, SWBT identified the direct investment and costs necessary to provide LIDB and CCS interconnection rate elements. Also in accordance with Commission rules, rates have been set to recover direct costs plus a reasonable level of overhead.

MCI requests that the CCSCIS costing model be made available for public scrutiny. CCSCIS contains engineering, pricing and operational information proprietary to several

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* All abbreviations used herein are referenced within the text.

companies. SWBT does not have the authority to disclose this information.

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I. INTRODUCTION

Five parties[1] opposed the Direct Cases of Southwestern Bell Telephone Company (SWBT) and the other Line Information Database (LIDB) owners. Generally, the five claim that (1) LIDB tariffs should contain information not usually present in tariffed service offerings; (2) LIDB owners should be financially responsible for calls validated in LIDB; (3) LIDB service should be provided at no charge or at cost; and (4) the Mutual Card Honoring Agreements (MCHAs) between AT&T and LIDB owners should be investigated. These claims are without merit and should be rejected.

II. SWBT'S TARIFFS CONTAIN THE INFORMATION REQUIRED

MCI contends that LIDB tariffs should contain certain information described below, with specific responses by SWBT after each item. MCI claims such information is necessary because "the LECs have so far performed so poorly in their database management

[1]The five parties are MCI, US Sprint, Allnet, CompTel and ITI.

role."[2] MCI also contends that "lack of tariff detail" has allowed the LECs to operate their databases "poorly."[3] MCI has expressed no operational dissatisfactions whatever to SWBT about LIDB. SWBT thus assumes that MCI's criticisms are directed elsewhere.

MCI's request for operational methods to be included in the LIDB tariffs may result from two failures on the part of MCI. First, clear and timely communication of its service needs in a medium other than a regulatory proceeding would more likely resolve MCI's problems and concerns. Second, MCI has only been utilizing SWBT's LIDB service for approximately three months. This is too short a time to determine SWBT's performance. Completion of transition from both the Billing Validation Application (BVA) and other validation data bases to LIDB was a massive undertaking by the industry and has only recently been completed. Conversions of this magnitude necessarily entail adjustment and improvement. MCI's request for LIDB tariffs to include operational procedures does not take into account the need for "fine tuning" of LIDB service. Cooperative efforts usually go far toward resolving such issues.

SWBT's tariffs fully comply with six of the ten MCI requests (listed below). Generally available sources exist for two more of the MCI requests, and SWBT intends to provide MCI with sufficient notice for the coordination identified in another

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[2]MCI, p. 9.

[3]Id.

request. The single remaining request (No. 2 in the list below) is unreasonable, burdensome and potentially damaging to SWBT.

The list of information which MCI claims should be included in the LIDB tariff, contained on pages 6-7 of MCI's Opposition, is set out below. SWBT's response immediately follows each item.

1. An explanation of the data that is available in the LIDB data base. Data in the SWBT's LIDB is described in the tariff. Section 26.1 states: "Access to the Telephone Company's LIDB provides customers with potential toll fraud detection by validating calling card and toll billing exception data and performing public telephone checks." Section 26.2 states: "LIDB Validation Service provides access to billing validation data which resides in the Telephone Company data base for use with alternate billing services. Alternate billing services allow customers' end users the ability to bill calls to an account not necessarily associated with the originating line. LIDB Validation Service supports alternate billing services such as Calling Card, Collect Calls, and Third Number Billing." Section 26.2 states: "LIDB Validation Service will provide the following functions on a per query basis:

- Validation of a telecommunications calling card account number stored in the LIDB.
- Determination of whether the billed line has decided in advance to reject certain calls billed as collect or to a third number.

- Determination of billed line as a public (including those classified as semi public) or nonworking telephone number."

Section 26.4.1 of SWBT's tariff states: "The Telephone Company's LIDB will contain a record for every working line number and Billed Number Group, as defined in Section 2.6 (Definitions) served by the Telephone Company."

These are more than sufficient descriptions of the services provided by SWBT's LIDB.

2. Identification of the LECs stored in the data base (i.e., independent companies). This information is already generally available to MCI by subscription to Bellcore's LIDB Access Routing Guide (LARG). Thus, this request is burdensome and duplicative. Also, inclusion of this information in SWBT's tariff could result in routing conflicts if required tariff revisions are not applied at the same time as on-going LARG updates. It is also inappropriate to include such information in LIDB tariffs because LECs enter private contracts with LIDB owners for the storage of data and may change from one LIDB provider to another.

3. The LIDB data base will be updated daily, by adding, deleting and modifying end user customer accounts as such customers move, become delinquent on their accounts, order service or cancel service. Section 26.4.1 of SWBT's tariff states: "The Telephone Company will update the LIDB information; e.g., add, delete, and modify customer accounts as customers move, become delinquent on their account, or order new service, on a daily basis."

4. Emergency updates relating to lost or stolen cards will be made on a real-time, on-line basis. Section 26.4.1 of SWBT's tariff states: "The Telephone Company has procedures in place to deactivate billing validation data in the event that it is being used fraudulently. Calling cards identified or suspected of being fraudulently used will be updated 7 days a week, 24 hours a day."

5. A guarantee that there will be daily 24 hour, single point of contact for LIDB customers to reach the data base administrator. SWBT has in place a 7 days a week, 24 hours a day data base administration system available to all LIDB customers. SWBT system personnel can be reached at any time by calling an 800 number established specifically for the purpose requested by MCI. Such operating procedures are not normally documented in a tariff.

6. A guarantee that LIDB customers will be provided with the scheduled downtime for the data base. The downtime should be scheduled to coincide with minimum traffic. LIDB is expected to operate 24 hours per day, 365 days per year. Section 26.3.5 of SWBT's tariff states: "The Telephone Company will administer its LIDB to insure the provision of acceptable service levels to all customers of the Telephone Company's LIDB Validation Service." Section 26.3.4 states: "LIDB Validation Service system downtime will be less than twelve hours per year." SWBT will provide MCI with sufficient notice of downtime required for system maintenance or upgrade.

7. A section listing LIDB performance standards. Section 26.3.4 of SWBT's LIDB tariff states: "LIDB Validation Service system downtime will be less than twelve hours per year. The LIDB

validation system is capable of processing up to 100 queries per second. The response time for a query, from switch transmission to reception, should not exceed one second for 99 percent of all queries." Additional LIDB performance parameters are documented in the technical publications referenced in SWBT's tariff.

8. The dates of the latest revision of all referenced technical publications. A waiver of Section 61.74 of the Commissions's Rules was requested and granted to SWBT under Special Permission No. 91-313 specifically to allow for reference to technical publications for proposed service offerings. SWBT's tariff thus contains a section titled "Access-Service Reference to Publications," which includes, as of the date of filing of the tariff, the dates of latest revisions for the publications referenced.

9. A description of the company's call gapping procedure, including the threshold levels that trigger the use of gapping. A description of this procedure is documented in Section 26.3.5 of SWBT's tariff. Additionally, the Bellcore Publication FR-NWT-000271 referenced in the LIDB Validation Service tariff contains detailed information on automatic call gapping procedures.

This is not a new issue from MCI. SWBT has responded on the public record to this question on at least two other occasions. When the LIDB experiences abnormal query volumes, it begins to adjust its processing priorities. The LIDB initially suspends low priority inputs from its supporting administrative systems. If this does not correct the processing overload, the LIDB then suspends all input from its administrative systems except for

emergency needs. If this fails to correct the problem, the LIDB then moves to higher levels of congestion control by imposing "code gapping."

"Code gapping" (or incorrectly "call gapping") is a process used to handle system congestion. Every response, during an overload, returned by LIDB to the switches which originate queries contains an Automatic Code Gapping (ACG) component. The ACG component contains a gap and duration index. The gap index tells the switch how long the switch should wait before sending another query to the LIDB. The duration index tells the switch how long it should continue to perform gapping. Code gapping begins at overload level 3.1, the next level beyond that described above. At overload level 4, the LIDB begins dropping one out of three of the queries received, and at level 5, two out of three of the queries received are dropped. At overload level 6, the LIDB discontinues processing of queries by sending out-of-service messages to its supporting Signaling Transfer Points (STPs). During an overload, all query responses contain the ACG component. The procedures are applied uniformly to all users of SWBT's LIDB.

In addition to the previous explanations by SWBT on the public record, and the technical publications referenced in SWBT's tariff, these procedures were presented to the Industry Carriers Compatibility Forum (ICCF) in November, 1990, by Bellcore on behalf of its client companies.

10. A description of the carrier's fraud prevention system. Section 26.4.1 of SWBT's tariff states: "The Telephone Company has procedures in place to deactivate billing validation data in the

event that it is being used fraudulently. Calling cards identified or suspected of being fraudulently used will be updated 7 days a week, 24 hours a day." Section 26.4.4 further states: "End user information, pertinent to the investigation, may be shared with LIDB customers when validation queries for the specific customer reaches the Telephone Company established fraud threshold level. This fraud threshold level will be applied uniformly to all customers."

As SWBT's Direct Case stated, it is not in anyone's interest to include additional information on fraud detection in a tariff. The SWBT tariff adequately describes (1) procedures for data base updates, (2) SWBT's liabilities, and (3) SWBT's responsibilities, with appropriate reference to technical publications. SWBT further explained that because these procedures are evolving and subject to change, it is inappropriate to detail day-to-day operations in a tariff. In addition, contrary to MCI's claims, tariff publication of SWBT procedures for detecting fraud could compromise those procedures.

Several meetings and conference calls have been held between SWBT and MCI to discuss fraud reduction, even though such were not acknowledged in MCI's Opposition. SWBT has agreed to make several changes to its operating procedures and has agreed to work with MCI to seek other improvements to its operations. As an example, well over a year ago, SWBT made an 800 number available to MCI for reporting fraud. MCI has only recently begun using the number. Also, if SWBT's fraud detection procedures were placed in its tariff, not only would such information be readily available to

toll fraud perpetrators, but modifications to the tariff could not be made without Commission approval. Surely, neither MCI nor the Commission wants this.

MCI has also requested a description of the difference between the 56 kbps CCS interconnection link and a 56 kps special access line.[4] SWBT believes that there are no technical differences between the 56 kbps Common Channel Signalling (CCS) Interconnection Link and a 56 kbps special access line that would warrant additional technical information in SWBT's tariff. In fact, in its June 8, 1990, waiver request, SWBT stated that the STP Access Mileage (56 kbps interconnection link) rate element would be a Special Access subelement that would reference existing Special Access rates. SWBT chose this course of action because the services are the same.

However, in a Memorandum Opinion and Order released October 4, 1991, DA 91-1258, the Commission ordered SWBT to establish the STP Access Mileage as a local transport subelement. SWBT therefore filed the STP Access Mileage element in Section 25 of the Access Tariff. Although STP Access Mileage is a Switched Access Service element, and 56 kbps channel mileage is a Special Access Service element, technologically the two services are the same and should not require further explanation in SWBT's tariff.

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[4]MCI, p. 18.

III. SWBT'S LIDB PRICES COMPLY WITH THE RULES ESTABLISHED BY THE COMMISSION

A. MCI

MCI claims that "since LIDB is a monopoly service, LEC attempts to price at a market (or a cost plus) basis, are completely inappropriate and must be rejected."[5] First, SWBT's calling card and validation services are no monopoly. MCI, other major interexchange carriers and the other regional Bell operating companies all have their own cards and validation services. Moreover, incremental costs properly identify the floor for pricing decisions for all services offered by a company. Clearly, the monopoly/non-monopoly distinction has nothing to do with costs. Cost calculations are not affected by the classification of a service. MCI is clearly trying to misuse this issue to achieve LIDB service at bargain basement prices--to the detriment of customers of other services, as well as SWBT shareholders.

In accordance with Commission rules for new service filings, SWBT identified the direct investment and costs necessary to provide LIDB and CCS interconnection rate elements. Also in accordance with Commissions rules, rates have been set to recover direct costs plus a reasonable level of overhead.

MCI complains about variations in costs.[6] There are many legitimate reasons for the cost of the same item to vary among LECs. For example, Common Channel Signalling (CCS) requires redundancy to ensure that the failure of one entity does not effect

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[5]MCI, p. 4.

[6]MCI, p. 20.

the entire network. Each Service Control Point (SCP) and Signalling Transfer Point (STP) has a mated pair capable of handling the load should one entity cease functioning. The individual geography of one LEC may allow for all hardware to be clustered close together, causing low transport costs--for example, a small LEC serving only one LATA. A LEC serving many states, on the other hand, may find it more efficient to diversify hardware, thus increasing transport costs. Similarly, in areas where earthquakes or other natural disasters are a threat, mated pairs will necessarily be located farther apart. Likewise, differences in geography may increase cost per mile. It costs more to lay cable in mountains than plains.

MCI discusses at length "overhead loadings." MCI's approach does not provide a clear method for the recovery of the joint, common or shared costs of telecommunications networks. Modern telecommunications networks increasingly seek to take advantage of economies of scale and scope. Certain technologies require substantial investment in shared facilities or telecommunications infrastructure. By the same token, some services will require little additional direct investment or direct expenses. At the extreme, consider a service provided with zero direct cost and zero direct investment, utilizing substantial shared investment. The MCI approach would require that the service be given away (an overhead factor times zero is still zero). Such short-sighted pricing approaches may lead to the avoidance of the network infrastructure necessary to provide the service in the first place. Such constrained pricing may also lead to the under-

recovery of the network infrastructure investments and the potential necessity of stockholders or customers of unrelated services covering the shortfall.

Even MCI's proposed ratemaking for such services below fully distributed costs (FDC) is untenable. A service with very low or zero direct costs would lead to an FDC level very low or zero when the primary driver in a FDC method is direct cost. It is the fundamental nature of allocations of overheads or joint and common costs that they are necessarily arbitrary and do not always recognize market realities or the difficulties that arise when substantial infrastructure investments occur.

Finally, MCI requests the Commission "to require the LECs to make their CCSCIS [Common Channel Signalling Cost Information System] costing model available for public scrutiny."[7] CCSCIS contains highly confidential engineering, pricing and operational information proprietary to several companies. SWBT does not have the authority to disclose this information. Should it do so in violation of its fiduciary duty, SWBT's ability to produce costs in the future would be seriously compromised.

CCSCIS is conceptually and functionally similar to the Switching Cost Information System (SCIS) model which has been the subject of so much debate in the Open Network Architecture proceedings. An independent auditor was used in the ONA proceedings to examine the SCIS model. The cost, over $700,000, renders this option impractical here. SWBT would suggest that,

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[7] Id., p. 23. See also Sprint, pp. 1-2.

because of the similarities of SCIS and CCSCIS, the Commission might use the independent auditor's findings in regard to SCIS to evaluate CCSCIS without the assistance of another auditor and without additional costs to the LECs.

B. Sprint

Sprint wants to know for which investment accounts the CCSCIS model was or was not used and why.[8] SWBT used CCSCIS to determine the STP port cost because this model quantified all the appropriate resources needed by the STP port and generated a per port investment.

Sprint states: "There is little information about the numerous 'Company Studies' used, and an evaluation of the reasonableness of the investments generated by them cannot be conducted."[9] The CCSCIS model has been validated against actual investment to ensure accounting for the full investment. In those instances in which CCSCIS was not used, SWBT has otherwise obtained correct investment data from network sources.

Sprint also notes that substantial variation exists in Part 32 investment accounts among LECs. Sprint's Attachment 2 displays the Part 32 investment accounts included in the LECs LIDB cost studies. Sprint appears to have used SWBT's April 21, 1992, filing to prepare this chart rather than SWBT's amended May 6, 1992, filing. The amended filing reflected Account 2212 - Digital

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[8]Sprint, pp. 2-4.

[9]Id., pp. 3-4.

Electronic Switching investment in both the LIDB Query Transport and the LIDB Validation rate elements. Further, Sprint points out that SWBT is the only company to include computer investment in the LIDB Query Transport rate element. While computer equipment was appropriately included by SWBT in the LIDB Validation rate element, it was inadvertently reported in SWBT's LIDB Query Transport rate element.

In addition, SWBT failed to reflect that Account 2232 - Circuit Equipment investment was included in the cost development for LIDB Query Transport.

Thus, Sprint's chart needs to be revised to reflect the following:

1. Add Account 2212 for LIDB Query Transport and LIDB Validation;

2. Add Account 2232 under LIDB Query Transport;

3. Omit Account 2124 from LIDB Query Transport.

C. Allnet

Allnet complains that the CCSCIS model is subject to inappropriate user flexibility.[10] Allnet also complains that the LECs have not adequately explained how CCSCIS works.[11] The ability of the CCSCIS user to vary input data and to "run" that data against engineering standards is a strength rather than a weakness. Because each LEC negotiates individual vendor contracts, and

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[10]Allnet, pp. 4-5.

[11]Id.

because each LEC incurs unique cost of money factors, CCSCIS obviously should be flexible enough to take into account user sensitive data. To suggest otherwise is not only ludicrous but violates fundamental principles of cost causation and cost integrity.

SWBT's Direct Case at page 5 describes the CCSCIS model as "engineering based," meaning the model is consistent with recognized and documented standards such as equipment manufacturers' technical and application publications. Indeed, the LECs develop their networks on the same standards. The Commission requirement to explain the cost process does not require, as Allnet suggests, an explicit identification of all engineering standards which may apply for a particular service. Such a requirement would be unworkably burdensome, duplicative of existing network engineering, and without relevance.

Allnet also criticizes the cost allocation documentation by those carriers not using CCSCIS,[12] but Allnet's comments addressing incremental costs add only confusion to this docket. The fundamental principle of incremental costing is that of cost causation. Costs are incremental to an action only if the costs are created as a direct result of the action. Incremental costs are the additional costs incurred by a company when providing a service. Incremental costs include variable and fixed costs. Investment, on the other hand, is any expenditure which is expected to yield a return in excess of the principle expended. For

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[12] Id., pp. 6-8.

example, investment includes power, land, and building costs. Allnet appears to confuse identification of incremental costs with identification of the incremental investment in which those costs were based.

In addition, Allnet is in error in supposing that such standard and commonly accepted economic terms as "volume sensitive unit cost" are the sole creation of U S West. The level of ignorance of basic cost principles demonstrated in Allnet's ludicrous allegations is appalling. Allnet's erratic, erroneous and misleading wandering through economic terms is not helpful to any party in this docket.

Allnet also inappropriately relates the cost of money to the Commission authorized rate of return and incorrectly claims that cost of money factors should not vary among account categories.[13] First, the levelized cost of money calculation includes the net investment base (gross plant investment less depreciation reserves and tax reserves). Since depreciation and plant investments vary by account categories, it would be both a surprise and a mistake if, as Allnet would have it, the levelized cost of money should be the same regardless of account category.

Second, incremental cost studies are designed to identify the true economic cost to the company of providing service and therefore ought to use the forward looking economic cost of capital, which ought not to be confused with a prescribed return for revenue requirement purposes. Identification of a

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[13] Id., p. 8.

prescribed rate of return is a function of revenue requirement determination, but has nothing to do with establishing the economic costs for pricing. Economic costs for pricing ought to be based on the actual cost of money a company expects to incur at any given point in time.

IV. SWBT'S LIDB AND MUTUAL CARD HONORING AGREEMENTS WITH AT&T ARE NEITHER ILLEGAL NOR DISCRIMINATORY.

ITI[14] and CompTel[15] have requested the Commission to investigate the Mutual Card Honoring Agreements (MCHAs) between AT&T and the LECs. All those in opposition to SWBT's Direct Case contend that SWBT should be responsible for all fraud associated with billing validation data contained in LIDB. These claims are without merit and should be rejected by the Commission.

SWBT's LIDB provides a billing validation service, not a guarantee of revenue collection. The purpose of allowing access to the LIDB's billing information is to assist LIDB customers in deciding whether to extend credit to the caller. SWBT has procedures in place to maintain a high level of accuracy for the billing information in its LIDB. Contrary to the assertions of MCI,[16] however, these procedures cannot determine if a caller is the authorized user of a valid LEC calling card. Neither SWBT nor anyone else has any way of determining at the time of call placement if the caller is the person to whom a particular card was

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[14]ITI, pp. 5-10.

[15]CompTel, p. 6.

[16]MCI, p. 16.

issued. Even if the caller is the authorized holder of the card, SWBT cannot guarantee that the holder will pay for the call.

SWBT's MCHA with AT&T only governs calling card calls and has no application to calls billed in other ways. The MCHA provisions thus do not extend to all validation attempts by AT&T in SWBT's LIDB. Also, the comments of ITI, CompTel et al. ignore that SWBT's agreement with AT&T is just that--an agreement. Several operational variables are addressed in SWBT's MCHA with AT&T, including: card formats, call transmission, validation, recording, rating, billing, revenue responsibility, and bill page appearance. The agreement of SWBT and AT&T on these points allows SWBT to have a relationship with AT&T that SWBT has with no other carrier. But no other carrier has situated itself like AT&T.

SWBT has repeatedly attempted to reach mutual card agreements with other carriers. Carriers should not expect SWBT to assume financial responsibility for calls charged to its card until those carriers, like AT&T, have agreed to perform call processing and billing in a mutually agreed and binding fashion. Neither can the other carriers expect SWBT to assume financial responsibility if LIDB rates are as low as those proposed by MCI, Sprint et al., rates which would truly relieve the carriers of revenue collection concerns.

V. CONCLUSION

For the reasons discussed above, the five oppositions should be denied, and SWBT's tariff should be allowed to take effect.

Respectfully submitted,

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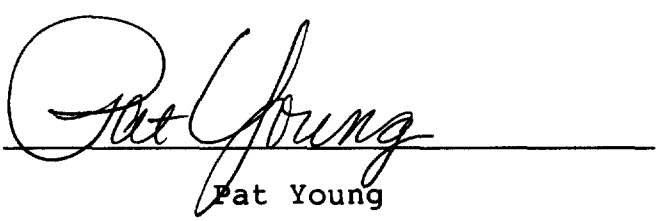
June 15, 1992

CERTIFICATE OF SERVICE

I, Pat Young, hereby certify that the foregoing "Reply of Southwestern Bell Telephone Company" in Docket No. 92-24 has been served this 15th day of June, 1992 to the Parties of Record.



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